

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	PS Docket No. 10-255
Framework for Next Generation 911 Deployment)	

**COMMENTS OF THE NATIONAL ASSOCIATION
OF TELECOMMUNICATIONS OFFICERS AND ADVISORS**

I. INTRODUCTION

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these comments in response to the Notice of Inquiry (“NOI”), released December 21, 2010, in the above-captioned proceeding.

NATOA’s membership includes local government officials and staff members from across the nation whose responsibility is to promote and serve the communications needs and interests of the nation’s local governments. NATOA strongly favors the goal of improving our nation’s 911 systems and applauds the Commission for initiating this proceeding.

II. DISCUSSION

As the Commission points out, by adopting a broadband-enabled, IP-based 911 network, NG911 will benefit public safety and homeland security in a variety of ways. Next Generation 911 (“NG911”) will permit the public to seek and obtain emergency

assistance by means other than traditional voice-centric devices; for example, via text messaging, photos, and videos. But the adoption of this technology will require NG 911 networks “to recognize which form of access the device is using when an emergency call is made and to provide the appropriate caller identification, location determination, call routing, and call signaling in each case.” But at present, “the legacy 911 [wireline] systems are not capable of receiving or processing these communications, and will not be until NG911 is deployed across the country.” As a result, “there are unmet consumer expectations concerning emergency service capability and reliability across new communications technologies.”

However, while the Commission is taking the necessary action to determine how these new technologies may impact emergency communications through the release of this NOI, we strongly urge the Commission not to forget the core purpose behind the 911 system – to connect a person in distress with the appropriate first responder. The fact that NG911 systems may provide additional IP-based information, such as “medical data, photos, videos, car collision telemetry, environmental sensors, gunshot sensors, etc.,” must not divert our attention from the fact that individuals calling 911 generally need immediate police, fire or medical attention delivered to a specific location in a timely manner. Any actions the Commission may take as a result of this NOI must be consistent with this underlying premise.

The goal of increased deployment of NG911 systems must not allow us to overlook the fact that our current system is not foolproof. For example, the Commission’s Public Safety and Homeland Security Bureau sent a letter dated February 17, 2011 asking Verizon how it dropped thousands of 911 calls in Montgomery and

Prince George's counties during a January 2011 blizzard. "The ability to call 9-1-1 is critical to the safety of the public. This is especially true during extreme weather events. The public rightly expects that they can use 9-1-1 to reach the appropriate first responders in an emergency," wrote public Bureau Chief James Arden Barnett.

The Commission, while looking to see what changes may be needed to facilitate NG911 implementation, must be mindful of changes that may needed to ensure our *current* system is operating properly. To do so, it is essential that industry and ALL levels of government be consulted and work together if our current and future 911 systems are to succeed. However, while the Commission correctly states that "in some states, 911 service is strictly a local matter," it appears to forget this fundamental aspect of 911 services when it seeks comment on how it and other federal agencies can coordinate on issues related to deployment of NG911 with state and Tribal governments, but omits *local* governments. It is imperative that the Commission include local governments in these discussions.

NATOA strongly urges the Commission to reinvigorate the Intergovernmental Advisory Committee ("IAC"), which played such an important role in advancing local government positions on important telecommunications issues, including 911 services. Putting the IAC back to work would provide the Commission with the local government perspective it needs.

For example, local governments strongly favor NG911 services and want to see them made accessible to all our residents. But we are concerned that any regulations ensuring access and deployment not impose any unfunded mandates that will adversely affect local government budgets. While the NOI does not address the issue of funding, it

is an issue that will be of utmost importance to local governments as plans for deploying a nationwide NG911 system proceed. Just as private industry will need additional time and resources to deploy NG911, local governments, too, will need additional funding and adequate time to implement new services and to revise current statutes and ordinances to accommodate new technologies. And these costs do not even include the potential additional liability costs that may arise from the variability and complexity of NG911 services.

In addition, we are concerned with how NG911 services, such as videos and photos, will affect government staff workloads as far as freedom of information requests are concerned and what changes must be made to existing confidentiality and disclosure laws. Also, retention policies will need to be reviewed to determine how and where these additional public records will be kept and maintained. As the NOI suggests, local governments will have to expand scarce public funds to review statutes and rules dealing with these issues.

Further, it is imperative that any actions the Commission takes to implement a NG911 system on a nationwide basis must be done with a flexible regulatory platform. NATOA is particularly concerned that the Commission may consider imposing a one-size-fits-all regulatory scheme for NG911 build-out that will improperly intrude on local government land use management. Local land use decisions must be made at the local level. In the past, local governments have been falsely portrayed by some industry participants as adverse to the deployment of advanced communications services, including NG911. But, as mentioned above, 911 services are strictly matters of local concern in many jurisdictions across the country. In addition, the vast majority of public

safety workers are city and county employees. City and county governments want the best 911 systems possible – to protect not only their residents, but their employees as well. The Commission must dismiss out of hand any unsubstantiated allegations of deployment delay by local governments.

III. CONCLUSION

NATOA appreciates the opportunity to share its views with the Commission on this matter. As we work toward the creation of a NG911 system, NATOA remains committed to its policy of ensuring that all residents have the communications networks they require to meet local community needs and to ensure the public's safety and convenience. We look forward to working with the Commission, industry, and all levels of government to achieve this goal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Steve Traylor', with a stylized, cursive script.

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